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April 8, 2015

Ms. Jan Palumbo (AWT-150)
United States EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Office of Air, Waste & Toxics

**Subject: April 2015 Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the March 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from March 16, 2014, to April 8, 2015.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period with two wells extracting groundwater (EW-2 and EW-4). No high-alarms were received during the month.
- Data from the First Quarter 2015 was received and is in the process of being validated.
- The Baxter team met with EPA on March 23, 2015. A summary of the Chemical Oxidation Bench Study was provided along with a discussion regarding the performance of the recirculation system. It was agreed that Chem Ox was not a feasible technology in the source area. EPA also agreed that the recirculation system works well for cutting off the source area based on significant reductions in the shallow plume downgradient of the recirculation system. The intermediate plume does not appear to be changing and therefore, Baxter proposed installing iSOCs to aerate the plume and enhance aerobic biodegradation of the PCP. The following action items came out of the discussion:
 - EPA is amenable to reducing the reporting requirements for the Remedial Action Pilot Study. Baxter will prepare a letter request.
 - EPA is amenable to reducing the amount of monitoring because many of the wells have been consistently non-detect and there is little value in continued quarterly sampling. Baxter will prepare a letter request with justification for a reduction in monitoring.
 - Baxter will assess the recirculation system in April/early May and prepare a focused work plan including installation of iSOCs into 3 intermediate wells and rehabilitation of the recirculation trench. The work plan is expected to be submitted by early June with the rehabilitation and iSOC installation to occur after EPA's approval of the work plan.

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ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system during the next reporting period; however, until the system is rehabilitated, it is expected that its performance will continue to be below optimum.
- Baxter will conduct a site visit to assess the recirculation systems and associated extraction wells. The wells where the iSOCs will be installed will also be examined to ensure that the plans for installation of the iSOCs are viable.
- Baxter will prepare a work plan for installation of the iSOCs and rehabilitation of the recirculation system. It is anticipated to be submitted to EPA in early June.
- Baxter will coordinate with EPA to determine the delivery of the First Quarter 2015 data submittal; whether it will be submitted as a quarterly report, or a data submittal associated with a Progress Report.

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Analytical Data for First Quarter 2015 was received and is in the process of being validated.

CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

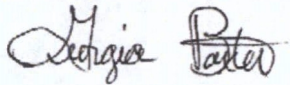
Signature:

Name: Georgia Baxter
Title: Chief Executive Officer
Date: April 8, 2015



We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter
Chief Executive Officer

cc: Jeanne Tran, Ecology
Jamie Hillery, Stella-Jones Corp.
RueAnn Thomas, Nattura Group

